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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W. Room 222
Washington, D.C. 20554

RE: In the Matter of Telephone Number Portability - CC Docket No. 95-116

Dear Mr. Caton,

Attached is additional information requested during Sprint's December 4, 1996, meeting on the above matter. Carol Matthey, Jeannie Su, Susan McMaster, and Linda Kinney represented the Common Carrier Bureau's Policy and Program Planning Division at the meeting.

It is requested that this information be made a part of the record in this matter. Two copies of this letter, in accordance with Section 1.1206(a)(1) of the Commission's Rules and Regulations are provided for this purpose.

Please call on the above telephone number if there are questions.

Sincerely,

Warren D. Hannah

Attachments

c:	Ms. Carol Matthey, FCC	Ms. Jeannie Su, FCC
	Ms. Susan McMaster, FCC	Ms. Linda Kinney, FCC
	Ms. Norina Moy, Sprint	Ms. Marcheta Maatsch, Sprint

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In follow up to our December 4, 1996 discussion, Sprint submits this additional information regarding bona fide request procedures for number portability implementation.

Sprint is involved in state number portability implementation workshops in Washington, California, Minnesota, Texas, Florida, Illinois, Ohio, Indiana, Maryland and the regional efforts in Colorado, Georgia, and the Bell Atlantic states. Sprint has been directly involved in a procedure to determine specific exchanges for number portability implementation in Florida, Illinois, Ohio and Indiana. To the best of Sprint's knowledge, the procedures have taken place as follows:

Florida

Florida local telephone competition legislation required implementation of true number portability; therefore in first quarter 1996, the Florida Commission Staff initiated workshops for this implementation. In recognition of the fact that the entire state could not reasonably be implemented with number portability in a flash-cut fashion, the Staff sent a list of all exchanges in the state to all local exchange providers (including those that were in the application stage) for them to determine a deployment priority. A workshop was then held for all providers to vote on their priority exchanges. Each provider was allowed twenty votes per LATA. These votes were then compiled and a list was distributed in May, 1996 to all providers with the name of the exchange and the number of votes. The intention of compiling this information was to then develop areas or clusters of exchanges that had a priority for deployment.

Because this list was being evaluated at the same time the FCC Order was released, the state has set this issue aside. Therefore, it is yet to be determined how exchanges will be chosen for deployment through the workshops because their focus has shifted to database vendor selection and other pertinent operational issues.

Illinois

The Illinois Commerce Commission opened a docket on April 7, 1995 to initiate a task force for local number portability deployment. Through the efforts of this task force, each competitive local exchange carrier was requested to submit a list of exchanges they wanted deployed with number portability in the Chicago MSA. The ICC Staff accepted these lists and compiled one comprehensive list which established the implementation schedule for the Chicago MSA. This procedure was handled in an informal, reasonable manner through the task force without a specific order from the ICC. Sprint was unable to find any specific documentation for this informal procedure which predates the FCC's order on number portability.

As a result of this informal procedure, the Illinois number portability workshops discussed documenting the procedure for use in other states. Because consensus could not be reached amongst the workshop members, this documentation was not finalized. However, the Ameritech comments filed with the FCC on October 7, 1996 reflect the bona fide request implementation procedure discussed in the workshops.

Ohio and Indiana

Both Ohio and Indiana have documented use of the bona fide request implementation procedure in their number portability workshop minutes (see attached). The procedure used is as described in Ameritech's comments. As indicated in these minutes, the state commission is involved in the procedure, but Indiana actually has an agreed upon consultant doing the work to create the list from the competitive local exchange carriers.

Indiana has extended the timeframe to finalize the list because all exchanges within the MSA were picked by a competitive local exchange carrier. The Staff has requested that CLECs reconsider their requests as to whether they need every exchange equipped with number portability for facilities-based competition. The list will be provided to Staff by December 9, 1996 and to ILECs on December 10, 1996.

Sprint believes that the bona-fide request procedure as set forth in Ameritech's comments are appropriate and beneficial for the deployment of number portability. This bona-fide request procedure will focus the efforts of implementation on facility-based competitive areas, allow for significant resource savings, and ultimately benefit all consumers. For these reasons and the sake of consistency, Sprint urges the FCC to adopt this procedure for use in all states.

The Public Utilities Commission of Ohio hosted the third Ohio Local Number Portability Workshop on November 13, 1996.

NOTE: This summary contains important information regarding LNP switch selection by new entrants and a Staff Advisement regarding regional participation.

The meeting was presided over by Chair, Terry Appenzeller and Staff member Scott Potter.

UPDATES ON PUCO, FCC, & NANC

Mr. Potter informed the workshop that the Commission had been apprised of the current progress and status of the workshop. He noted that the Commission, had not to this date voiced any major concerns. However, he did not that there was some discussion of the workshop decision base the LNP conversion plan on switch location as opposed to subscriber location.

Mr. Appenzeller briefed the workshop on the recent meetings of the NANC and the LNP working group of the NANC. The NANC LNP working group is to be co-Chaired by Mr. Appenzeller and Woody Kerkeslager of AT&T. Updates on the NANC and its working groups can be found on the FCC Web page at "www.fcc.gov" under the Common Carrier Bureau section. This page will also contain a link to the ICC workshop web page ("www.ported.com").

Additionally, Mr. Appenzeller gave the workshop his best guess as to when the FCC would rule on the reconsideration requests and how those rulings might look.

LNP Pick Lists

Mr. Potter distributed the Master "Pick From" lists to the new entrants present at the workshop. There was discussion of how the selection process would proceed and how Staff would merge each new entrants selection into a prioritized implementation list. The following points were agreed upon:

1. All facilities-based new entrants who have a need for number portability within Phase 1 of the Ohio workshop process, must have their "Pick From" list returned to Mr. Potter no later than January 6, 1996. This is the absolute deadline for inclusion in the Phase 1 conversion.
2. It is expected that all new entrants making switch selections will make an honest good faith appraisal of their short-term LNP needs, and not request switch conversions on a scale beyond their best guess of short-term facilities-based service offering. In the event that Staff finds one or more new entrants have made widespread switch selections that appear to be beyond our understanding of the new entrant's short-term service plans, this issue will have to be addressed further. Mr. Potter suggested that in this event, the Commission would likely become involved and Staff would probably recommend that new entrants be required to submitted substantial supporting

documentation to support their LNP requests. Mr. Potter noted that if it is necessary to go to this step, LNP availability would likely be delayed for all new entrants.

3. Pick lists can be submitted in either hard copy or digital format. Both hard copy forms and disk forms were distributed by Mr. Potter. Staff will only accept Pick Lists on the standardized forms. Mr. Potter requested that if a new entrant has more than a few switch picks, that they try to submit their Pick List in digital format.

4. New entrants should simply indicate the switches they need converted without any prioritization. Staff will develop a prioritized list based on the number of requests for each switch. Staff will also take note of any new entrants who have relatively few switch requests and whether those switch requests represent unique requests. In these cases, Staff will give additional weight to those requests to present all new entrants entering the marketing on a very limited basis who might be the only new entrant in an area from falling to the bottom of the prioritized schedule.

5. It was clarified that the Ohio workshop Phase 1 and Phase 2 are Not to be confused with the FCC's schedule for the top 100 MSAs. Phase 1 is the opportunity for new entrants to request upfront the initial set of switches which will be converted to LNP. Phase 2 which may follow directly on the heels of Phase 1, is for carriers to make individual requests to specific LECs for LNP. Requests made during Phase 2 will be met according to a timeframe based on the technical status of the network and switch requested. This Phase 2 timeframe has not been finally agreed to at this time.

Regional LLC and Operations Committee

Mr. Appenzeller also updated the workshop on the progress of the Developing a regional LLC. The next regional LLC meeting is Nov. 22 in Detroit. This is a meeting for business strategy persons of any carrier that might be considering joining/or has an interest in the development of the regional LLC. Mr. Appenzeller noted that there is already a tentative agreement as to the cost allocation to the member companies.

Barry Bishop, Chair of the ICC workshop Operations Committee, updated the Ohio workshop on the effort to build a regional Operations committee. Mr. Bishop and Mr. Appenzeller stressed that it is imperative for all interested parties to immediately begin attending the regional meetings if they wish their organization to have a voice in the development of the regional LNP system that all will be subjected to in the near future. If anyone wishes to get more information on the regional Operations committee, please contact Mr. Bishop at "barry.bishop@portad.com"

STAFF ADVISEMENT:

The Ohio Workshop is a Commission ordered process that was meant to be the forum in which the implementation issues of Ohio LNP would be decided. The Ohio workshop has decided to participate in the developing regional system. Any carrier with an interest in having a voice in the development of the system they will be expected to operate under should immediately get involved in these regional meetings (especially the LLC and Operations committee meetings). It is likely that the Ohio workshop will conclude its regular monthly meetings after the January meeting. However, it is likely that the Ohio Workshop group will continue to serve in a Ohio Steering Committee capacity for any Ohio specific issues referred by the regional efforts or the PUCO.

Next Meeting

The next meeting is scheduled for January 9th, 1997 at 10:30AM in the PUCO offices.

INDIANA NUMBER PORTABILITY TASK FORCE

CAUSE NUMBER 30003

October 7, 1996

I. INTRODUCTION

The third meeting of the Indian Number Portability Task force was held on October 7, 1996 at 9:30 a.m. at the Commission's Office in Indianapolis. Terry Appenzeller from Ameritech chaired the meeting.

II. MEETING ATTENDEES

A list of the meeting attendees is attached.

III. FOLLOW UP FROM LAST MEETING

At the August 18, 1996 meeting a schedule had been agreed to for developing an implementation plan. Based on this schedule, the new entrants were to identify to an independent consultant, the exchanges that they want to enter by September 18, 1996. (Letter from Stan Sallier, dated September 4, 1996.)

For a variety of reasons, only one Competing LEC (AT&T) had submitted it's list of Exchanges as of this meeting. As this effort is critical for determining the cost of implementing LNP for the State of Indiana as requested by the IURC in a report due on November 8, 1996, the task force agreed to:

- a) establish a revised schedule;
- b) submit a preliminary progress report to the IURC on November 8, 1996
- c) request an extension for the cost estimate due to the IURC. The requested date would be January 8, 1997.

The following revised schedule was agreed to:

10/21/96: New entrants to identify by MSA, exchanges they want to enter. These lists are to be sent to Brad Bohounek, an independent third party consultant, at:

Brad Bohounek
473 Broadview Avenue
Highland Park, IL 60035
Telephone: 312.301.2723

INDIANA NUMBER PORTABILITY TASK FORCE

CAUSE NUMBER 30043

October 7, 1996

III. FOLLOW UP FROM LAST MEETING (continued)

10/28/96 Brad is to compile a master list of Exchanges for each MSA, by combining requests from all Competitive LECs. The requesting CLEC's name will NOT be identified. Brad will provide this list to the IRUC and incumbents on this date.

11/11/96 The incumbents, Ameritech, GTE, Sprint and any Independents will compile a report with their offices on the master list and the schedule for providing Number Portability.

Main Report Extension

Request: The Task Force unanimously voted to have the two co-chairs (Terry Appenzeller, Ameritech and Judy Evans, AT&T) sign the extension request on behalf of the Workshop.

Report Authors: The following companies agreed to author the reports (preliminary progress report and main report, including a cost estimate):

Ameritech
GTE
Sprint
Smithville
AT&T
MFS

Preliminary Report

Schedule: The First draft is due on October 25, 1996. Comments and Feedback is due November 1, 1996. Submit the Preliminary Report to IRUC.

IV. New Issues

NANC: Terry Appenzeller reported on the first NANC meeting October 1, 1996. NANC is forming two (2) task forces.

The first NANC task force will counsel the FCC on how to move Number Administration from Bellcore to a neutral third party. The Number Administration Task Force will have it's first meeting on November 7, 1996. It is scheduled to complete it's work by January 1, 1997.

The second NANC Task Force will work on LNP Database Administration. This task force will look at issues such as "Standardization of Interfaces" and "Regulation of State Efforts". The LNP Task Force is schedule to complete it's work by May 1, 1997.

DNA/tak

INDIANA NUMBER PORTABILITY TASK FORCE

CAUSE NUMBER 35983

October 7, 1996

IV. New Issues (continued)

NPAC / LLC:

Roger Marshall presented a report on the Illinois NPAC, selection of Lockheed, as the vendor and the formation of the Limited Liability Corporation (LLC). The responses to some of the questions are outlined below.

- A Service Provider does not have to be an LLC member to use the NPAC. Lockheed will provide its services to all users; LLC members and non-members on the same terms.
- The purpose of the LLC is to manage the relationship with the Vendor and negotiate the Master Contract. Each Service Provider/User must sign a separate agreement with Lockheed.
- The LLC will be regionalized.. Each member will only pay/join once for the whole region instead of signing up for each individual state.
- The LLC will ask Lockheed to base cost allocation on any directives forthcoming from the FCC and/or State Commissions.
- Any Indiana workshop participant interested in joining the LLC should contact Roger Marshall, Ameritech, or Daniel Noorasi, AT&T. (See attached Attendee List)

V. Next Meeting

The next meeting has been scheduled for November 8, 1996 at 10:30 a.m. in the Commission's Law Library.

The following Illinois Workshop committees will make presentations at that meeting:

1. Rating and Billing
2. Operations